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October 28, 2021

Via ECF

Honorable Sarah L. Cave
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007


SARAH L. CAVE
United States Magistrate Judge

Re: *Curry et al. v. P & G Auditors & Consultants, LLC et al.*,
Civil Action No. 20-cv-6985 (LTS) (SLC)

Dear Judge Cave:

We represent P&G Auditors and Consultants, LLC, GRC Solutions, LLC, and PGX, LLC (the "Contractor Defendants") in the above-captioned matter. We write on behalf of all Parties in the above-referenced action to request an extension of the current deadline to complete discovery, and to propose a revised discovery schedule.

Previously on February 26, 2021, the Court entered a scheduling order stating that the deadline for the completion of all fact discovery was Thursday, September 30, 2021, and that the parties would "focus discovery on information related to and the depositions of the three named-Plaintiffs: Kenneth Curry, Ricardo Mazzitelli, and Jacqueline Brown-Pilgrim." See ECF No. 96. On March 5, 2021 however, this Court issued a stay of discovery for a period of eight weeks. See ECF Dkt. No. 102. Following an unsuccessful mediation, the stay of this action was lifted on May 21, 2021. See ECF Dkt. No. 117. Further, on June 14, 2021, the Court issued an Opinion an Order granting in part and denying in part Plaintiffs' Motion for Collective Action Certification. See ECF Dkt. No. 122. In light of the Court's decision, the Parties met and conferred, and agreed to proceed with discovery regarding the Named Plaintiffs and current opt-in plaintiffs. In light of the procedural history of the case (including a change in defense counsel for the Contractor Defendants), the Parties recognize that they will need additional time to ensure that this discovery can be completed. Accordingly, the Parties jointly propose to extend the deadline to complete fact discovery through June 24, 2022. Additionally, the parties request the Court set a status conference for the week of February 28, March 7, or March 14, 2022, for the parties to discuss the status of discovery, including any issues arising from any additional opt-ins joining the case by the end of the notice period on December 24, 2021.

The parties' letter-motion requesting an extension of the deadline to complete fact discovery (ECF No. 147) is GRANTED, and the deadline to complete fact discovery is EXTENDED to **Friday, June 24, 2022**. The parties shall submit a joint status report certifying that fact discovery is complete by no later than **Friday, July 1, 2022**.

A Discovery Status Conference is scheduled on **Tuesday, March 15, 2022 at 2:00 pm on the Court's conference line**. The parties are directed to call: (866) 390-1828; access code: 380-9799, at the scheduled time.

The Clerk of Court is respectfully directed to close ECF No. 147.

SO ORDERED 10/29/2021

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Thank you for Your Honor's attention to this matter.

Respectfully submitted,

s/ Seth D. Kaufman

Seth D. Kaufman
For FISHER & PHILLIPS LLP

cc: Counsel of record (via ECF)